

Exhibit 7

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Unbundled Access to Network Elements)	WC Docket No. 04-313
)	
Review of the Section 251 Unbundling)	
Obligations of Incumbent Local Exchange)	CC Docket No. 01-338
Carriers)	

DECLARATION OF GINA BORLAND
On Behalf of General Communication Inc.

1. My name is Gina Borland, and I am Vice President and General Manager of Local Service for General Communication, Inc. ("GCI"). In that capacity, I am responsible for the Local Service line of business. I have held this position since January 2001. I have been with GCI for fifteen years. Prior to my current position, I was Vice President of Corporate Development. In that position, I was responsible for evaluation of potential new business endeavors.
2. In this declaration, I explain, based on my experience and expertise, why it is critical that the FCC establish national obligations for a batch cut process. In GCI's experience, coordination, notification, and standards of performance for completing hot cuts are required to ensure successful and timely customer conversions. In addition, I describe why, as part of any transition plan, the Commission should provide a reasonable time for CLECs to develop alternative methods of DSL-delivery when an ILEC deploys network devices, like DLCs,

that interrupt the CLEC's ability to provide broadband services to its customers served via existing loops.

I. THE COMMISSION SHOULD ADOPT MINIMUM STANDARDS FOR A BATCH CUT PROCESS

3. GCI entered the Anchorage local service market in 1997. In the absence of a batch cut process, our customers have been historically subject to significant processing and provisioning delays that resulted in service outages and delays in receiving service from their desired carrier. The same is true of customers in Fairbanks and Juneau, as described below. ACS' provisioning practices for GCI and the absence of effective performance measurement and enforcement mechanisms significantly contributed to customer delays, frustration, and dissatisfaction.

4. The problems with ILEC abuses in the absence of such processes and standards are not borne solely by customers, but the requesting carrier also suffers significant harm as a result. In GCI's case, we were not able to maximize use of its deployed switching facilities due to provisioning delays. Second, customer dissatisfaction arising out of the delays affected GCI's relationship with potential customers when GCI was precluded from providing firm or satisfactory service due dates in the absence of coordination, notification, and metrics. Introduction of greater certainty into this process by the adoption of a batch cut process, as originally envisioned by the FCC in its *Triennial Review Order*, would help normalize provisioning time frames, provide greater consumer certainty, and is in the public interest.

5. In the absence of batch cut requirements and associated standards, GCI (and presumably ACS, as well) expended significant financial and personnel resources in